

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: Anthony J. Rodriquez  
& Brenda M. Cirillo  
  
Debtor

CHAPTER 13  
CASE NO. 13-41492-MSH

**MOTION TO CONTINUE SHOW CAUSE HEARING SCHEDULED FOR  
JULY 16, 2013**

Now comes William T. Bogaert, Esq. ("Counsel") specially appearing for Attorney Rose Clayton, Esq. ("Attorney Clayton") for the purpose of this motion only and hereby respectfully moves to continue the hearing scheduled for July 16, 2013 on the Court's Order to Appear and Show Cause Why She [Attorney Clayton] Should Not be Ordered to Disgorge Her Fee for Her Failure to Properly Represent her Clients. ("Order"). The good faith grounds for this motion are as follows:

1. On June 19, 2013, this Court ordered Attorney Clayton to file a fee application, within 14 days, regarding the Chapter 13 bankruptcy petition filed by the Debtors Anthony Rodriquez and Brenda Cirillo.
2. Attorney Clayton has been Administratively Suspended by the Massachusetts Supreme Judicial Court and it is Bar Counsel's position that she is prohibited from appearing as counsel before any tribunal in the Commonwealth.

07/15/2013 ALLOWED. HEARING IS CONTINUED TO AUGUST 20, 2013 AT 10:00 A.M. NO FURTHER REQUESTS FOR CONTINUANCES WILL BE GRANTED. IF MS. CLAYTON IS UNABLE TO APPEAR SHE MAY DESIGNATE COUNSEL WITH AUTHORITY TO REPRESENT HER IN THESE MATTERS TO APPEAR ON HER BEHALF.